Scottish & Southern Electricity Networks

TRANSMISSION

Pre-Application Consultation Report

Emmock 400kV Substation

October 2024

Scottish & Southern Electricity Networks
TRANSMISSION

CONTENTS

1. INTRODUCTION

1.1 Purpose of this Report

1.1.1 This Pre-Application Consultation (PAC) Report is submitted by Scottish Hydro Electric Transmission plc, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), as part of an application for full planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) ('TCPA') for the construction and operation of a 400kV AC substation, and the associated undertaking of earthworks, the formation of platforms, landscaping, means of access, means of enclosure, site drainage, temporary construction compounds and other associated operations at Land south west of Balkemback Farm, Tealing, Angus. The proposed substation is known as Emmock substation and is located to the north-east of the existing Tealing substation.

1.1.2 The PAC Report is submitted as a requirement of S35C of the TCPA in accordance with requirements prescribed in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) (The DMRs) and particularly with reference to Section 7B, which prescribes the content of PAC Reports. The author has also consulted *Planning circular 3/2022: development management procedures*.

1.1.3 In general, the PAC Report provides an overview of the consultation programme and describes: the findings from the PAC process; the steps taken to meet statutory requirements; the feedback received during the PAC process, and how we responded.

1.2 Structure of this Report

1.2.1 The PAC Report is structured as follows:

1: Introduction;

2: Project Background – outlines the background to the project and provides a description of the key elements and non-statutory consultation undertaken;

3: The Consultation Process – describes the submission of Proposal of Application Notices (PANs); the dates and venues for consultation events; any additional consultation required (or otherwise) by the local planning authority, and how these events were publicised;

4: Consultation feedback and our responses – summarises the written responses to consultation and the views raised at public events, as well as the number of written responses received and attendees at events; and

5: Conclusions.

1.2.2 Appendices are attached to provide evidence of consultation and publicity carried out.

2. PROJECT BACKGROUND

2.1.1 Scottish and Southern Electricity Networks Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates, and develops the high voltage electricity transmission system in the north of Scotland and remote islands and has a statutory duty under Schedule 9 of the Electricity Act to develop and maintain an efficient, co-ordinated and economical electrical transmission system in its licence area.

2.1.2 The Emmock 400kV substation proposals form part of a wider programme of works known as the Kintore to Tealing 400kV projects, which also include:

- a new 400kV substation called Hurlie, in Aberdeenshire, which will be subject to a TCPA application;
- a new 400kV overhead line connection from Kintore, which will be subject to an application under Section 37 of the Electricity Act 1989;
- two 400kV reconductoring upgrades between Alyth and Tealing, and Tealing and Westfield, also to be subject to applications under Section 37 of the Electricity Act 1989; and
- overhead line tie-ins and temporary diversions around the proposed Emmock substation and the existing Tealing substation, subject to an application under Section 37 of the Electricity Act 1989.

2.1.3 This PAC report is submitted with reference to feedback received for the Emmock substation proposals, which are summarised below. Consultation events, materials and feedback forms were designed with the need to delineate feedback on separate applications in mind.

2.2 Proposed Development

2.2.1 The planning application is submitted for development comprising the construction and operation of a 22 bay, 400/275 kV Air Insulated substation located on a level platform and the formation of associated earthworks, access, drainage, landscaping, security, and temporary construction compounds, in the arable fields south of Balkemback Farm, south of the Sidlaw Hills in Angus, and approximately 2.6 km north of Dundee.

2.2.2 A full description of the proposed development can be found in Chapter 3 of the EIA Report (Volume 2) submitted with the planning application.

2.3 Requirement for Pre-application Consultation

2.3.1 Regulation 4 of the DMRs requires that pre-application consultation is carried out for all national and major developments. National and major development types are defined by the Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 ('the Hierarchy Regulations'). All developments that are not national or major are classified as local developments and are not required to undergo pre-application consultation.

2.3.2 National development which expands the electricity transmission grid is described under 'National Development 3 Strategic Renewable Electricity Generation and Transmission Infrastructure' in the fourth National Planning Framework (NPF4). Development that falls in this category is described as National development if it would have otherwise been considered major development under the Hierarchy Regulations. Major developments are described in the Hierarchy Regulations under Regulation 2(1), and the proposed development falls under 9. *Other Development*, where the area of the site is or exceeds 2 ha.

2.3.3 The proposal is therefore classified as a National Development under the terms of the Hierarchy Regulations and NPF4.

2.4 Early Non-Statutory Consultation

2.4.1 Prior to developing the proposals at the proposed Emmock substation site and submitting a PAN to begin the formal PAC process, SSEN Transmission undertook non-statutory public consultation on the Kintore to Tealing 400kV projects in May 2023, as well as direct engagement with statutory and non-statutory consultees, community councils, elected representatives, and landowners and occupiers.

2.4.2 Public events were undertaken in relation to preferred substation locations, overhead line corridor locations, and reconductoring projects in Angus, at the following dates and locations:

- 9 May 2023 (2-7pm) Brechin City Hall
- 10 May 2023 (2-7pm) Kirriemuir – Westmuir Hall
- 11 May 2023 (2-7pm) Tealing – Tealing Village Hall

2.4.3 Supporting this consultation was a consultation document published in May 2023, detailing key project elements, the site selection process to date, and key questions for feedback. Public events were attended by members of the SSEN Transmission project team and appointed consultants and included information boards and large format maps.

2.4.4 An online consultation portal was made live on the project website, and viewers were able to submit feedback forms online. A virtual public event also took place on 17 May 2023 (4-6pm). Viewers of the online portal were able to provide feedback online, and a general feedback email address was established ('tkup@sse.com') for members of the public to provide written responses, which has been operational throughout the period leading up to planning submission.

2.4.5 A drop-in consultation event was also held at Forfar Reid Village Hall on 13 July 2023 (1-7pm) for members of the public and all interested parties from in and around the Forfar area.

2.4.6 The early non-statutory consultation process, as well as summaries of the feedback received and SSEN Transmission's responses to that feedback are presented in the Tealing Report on Consultation (November 2023).[1]

2.5 Pre-application Engagement with Planning Authority and Statutory Consultees

2.5.1 Seven rounds of online engagement meetings with key stakeholders have been undertaken since December 2022. These meetings have included representatives from Angus Council, Scottish Environment Protection Agency (SEPA), NatureScot and Historic Environment Scotland (HES). These meetings have generally covered all the Kintore to Tealing 400kV project proposals, including Emmock substation, as they have developed through the site and corridor/route selection process and as more developed proposals have been under development. Stakeholders have had the opportunity to provide feedback at these meetings and separately in writing or in follow up phone calls. A representative of Angus Council was present at all but one of these stakeholder meetings.

2.5.2 Angus Council does not currently offer a formal pre-application service for prospective applicants[2], however, SSEN Transmission have undertaken some ad hoc informal engagement with the key planning officer contact to provide updates on proposals and ask questions. This is in addition to exchanges with the planning officer via email and engagement via key stakeholder meetings.

2.5.3 Angus Council, HES, NatureScot, SEPA, Glamis and Area Community Council, Tealing Community Council, and various non-statutory consultees were notified of PAC events being undertaken and sent consultation

[1] This report is available to download under the Documents tab at: https://www.ssen-transmission.co.uk/projects/project-map/emmock-400kv-substation/
[2] See: https://www.angus.gov.uk/planning_and_building/planning_permission_and_applications/pre_application_advice_and_surgeries

materials via email. They were invited to respond as part of this process and responses are summarised in Section 4.

3. THE CONSULTATION PROCESS

3.1.1 The statutory pre-application consultation process began with the submission of the PAN, which identified dates and locations of consultation events in respect of the proposals that were undertaken in March 2024, then in June 2024. For the purposes of providing the PAN, PAC events were identified at a single suitable location in proximity to the development site, however, for every round of consultation, multiple events in other nearby venues were carried out featuring the same information on the proposals and with the same opportunity to raise questions and provide feedback.

3.1.2 This section describes the consultation process and demonstrates how statutory PAC requirements have been met. The PAC process is specified in Section 35B of the TCPA 1997, and in Regulation 7 of the DMRs. In preparing this PAC Report we have been informed by the requirements of Regulation 7B of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) and the guidance contained in *Planning circular 3/2022: development management procedures*.

3.2 Proposal of Application Notice (PAN)

3.2.1 A PAN must be submitted to the Local Planning Authority (LPA), containing the information prescribed in 35B(4) of the TCPA 1997 and Regulation 6 of the DMRs, including an account of what consultation the applicant intends to undertake and information as to when such consultation is to take place, with whom and what form it will take.

3.2.2 A PAN, with covering letter and plan identifying the location of the proposals, was submitted to Angus Council on 31 January 2024, marking the beginning of the statutory consultation period. The PAN provided the Council with an outline of the application details, dates of public events, publicity arrangements, and confirmation of the site location. A copy of the PAN and plan identifying the land is provided in **Appendix A.**

3.2.3 The PAN and attachments were also distributed via email on the same day to the following organisations and elected representatives: Tealing Community Council, and neighbouring community councils; Monifeith and Sidlaw ward councillors; constituency, neighbouring and regional MSPs; and constituency and neighbouring MPs at Westminster. Full details were contained in the covering letter and are copied in **Appendix B.**

3.2.4 The PAN identified two events to take place at Tealing Village Hall on 7 March 2024 and 5 June 2024.[3]

3.2.5 The PAN was registered by Angus Council under the reference number 24/00058/PAN on 19 February 2024, noting the intention to respond within 21 days of receiving the PAN to advise whether the proposed PAC was satisfactory, or if additional consultation was required. No advice on additional consultation requirements was received within or out with this period.

3.2.6 Following submission of the PAN, a report[4] was submitted by the Angus Council *Service Leader – Planning and Sustainable Growth* to the Development Standards Committee for discussion at the committee meeting on 12 March 2024. The report identified key issues at the pre-application stage, and recommended the Committee advise of any other issues it considers the applicant should address in the planning application.

3.3 Newspaper Notices

3.3.1 Newspaper notices were published in a newspaper circulating locally to the proposed development to publicise the PAC events described in the PAN.

3.3.2 For the first consultation event, the newspaper notice was published in The Courier on 26 February 2024. For the second event, a newspaper notice was published in The Courier on 27 May 2024. Care was taken to

[3] Note that an additional event was held at Tealing Village Hall on 6 June 2024, however this was not identified in the PAN.
[4] Report no. 98/24, dated 4 March 2024

ensure that notices were published at least seven days in advance of the events and contained all the information required by Regulation 7 of the DMRs. Copies of the notice were also made available in the online public notices that can be accessed from the newspaper's website, from the date that the notice was printed.

3.3.3 Copies of the newspaper notices are provided in **Appendix C.**

3.4 Additional publicity of public events

3.4.1 In addition to the publication of the newspaper notices, the PAC events were advertised extensively to make sure residents, and local businesses were aware of them and how to find more information on the proposals.

3.4.2 Public consultation posters providing general introductory information on the proposals and advertising the planned public events were published in two local newspapers at the dates identified below.

The Courier:
- Event 1: 20 February to 2 March 2024
- Event 2: 20 May to 1 June 2024

The Angus County Press:
- Event 1: 22 and 29 February 2024
- Event 2: 23 and 30 May 2024

3.4.3 An example of these advertisements used in respect of both events in both newspapers are shown in **Appendix D.**

3.4.4 Public consultation posters were circulated to Tealing Community Council for sharing with the community and on their media platforms. Emails were sent directly to the elected Councillors, MSPs/MPs in the area, and the Tealing Community Liaison Group. Copies of these emails are also shown in **Appendix D.**

3.4.5 A letter, copied in **Appendix E**, informing of the initial series of events was delivered to 81,785 households within a 10km radius of the Proposed Development on 19 February 2024. This was reduced to 19,190 households within a 3km radius for later consultation following feedback received from households that requested the radius be reduced as they had been unnecessarily notified.

3.4.6 Information on the public events was shared on the dedicated project website.[5] A Press Release issued to all relevant press and also published on the SSEN Transmission website. [6]

3.4.7 Notification of the events was made via social media, by means of the SSEN Transmission Facebook, Instagram and X (Twitter), which can be viewed in **Appendix D.**

3.5 Public Consultation Events

First PAC event

3.5.1 The first PAC event in respect of the Emmock substation proposals was held at Tealing Village Hall, Tealing, between 2-7pm on 7 March 2024. The purpose of the first public event was to provide an opportunity for members of the public and local stakeholders to view information about the project, ask questions and provide feedback in person. The event was attended by SSEN Transmission staff as well as consultants working on the project to answer questions.

[5] Available at: https://www.ssen-transmission.co.uk/emmock

[6] Available at: https://www.ssen-transmission.co.uk/news/news--views/2024/5/ssen-transmission-announces-next-phase-of-public-engagement-for-pathway-to-2030-infrastructure-in-the-north-of-scotland/

3.5.2 SSEN Transmission produced a 28-page consultation booklet in advance of the March 2024 PAC events, which was made available on the project website and in physical copy to take away which included key project details, plans and 3D visualisations, contact details, key dates, a feedback form, and information on how to provide comments online and to the project inbox. This booklet is attached as **Appendix F**. The publicised feedback period for the first public consultation event was open for 6 weeks and closed on the 15 April 2024.

3.5.3 The Applicant produced a number of additional materials to explain the proposals, including:

- Information banners consistent with the information in the consultation booklet, which can be viewed in **Appendix G;**
- Interactive 3D Visualisations, where attendees could look at a 3D model of the proposals at all angles and from a variety of distances; and
- Size A0 maps of the location, key designations, and project proposals displayed on tables.

3.5.4 Following the consultation event, SSEN Transmission issued an update on the project website thanking members of the public for attending and advised all material that had been displayed was available for download.

Second PAC event

3.5.5 The second and final PAC event in respect of the substation proposals was held at Tealing Village Hall between 2-7pm on 5 and 6 June 2024.

3.5.6 The purpose of the final public event was to give feedback to members of the public in respect of comments received regarding the proposed development from earlier consultation, and to provide further opportunity to view information about the project, ask questions and provide feedback in person. The event was attended by SSEN Transmission staff as well as external consultants working on the project to answer questions.

3.5.7 SSEN Transmission produced a 26-page consultation booklet in advance of the June 2024 PAC events, which was made available on the project website and in printed copy to take away. It included updated project details, contact details, key dates, a summary of feedback along key themes that had been received since the first events, as well as the SSEN Transmission response to this feedback, and information on how to provide further comments. It was also used as an opportunity to share information on key changes made following the first event to substation and landscape design, the construction process, other local projects, and 3D visualisations. This booklet is attached as **Appendix H**. Information banners for the second PAC event are shown in **Appendix I.**

3.5.8 In response to more generalised feedback, SSEN Transmission published a number of information leaflets on topics of interest for attendees, including the following which were relevant to the substation application:

- Planning Applications under the Town and Country Planning (Scotland) Act 1997
- Electro Magnetic Fields Leaflet
- Protecting Private Water Supplies
- Pathway to 2030: Why are these projects needed?
- Delivering legacy benefits through Pathway to 2030 Projects
- Biodiversity Net Gain

3.5.9 All of these were published in May 2024 and copies were available to members of the public at consultation events following.[7] Other leaflets were produced at the same time (and since) of greater relevance to overhead lines and consent applications under Section 37 of the Electricity Act 1989.

3.5.10 As with the first event, information boards were produced consistent with the updated information in the June consultation booklet, as well as 3D visualisations, and large format maps.

3.6 Additional Steps Taken to Consultation

3.6.1 No additional consultation requirements were specified by Angus Council following submission of the PAN. Public notices were placed in respect of both public events as described in section 3.3 above, and additional publicity of the events was undertaken as described in section 3.4.

3.6.2 Note for the second event (5 June 2024) noted in the PAN, another identical PAC event was held in Tealing Village Hall on 6 June 2024. For the purposes of presenting information and collection further feedback these events are treated as one and were publicised accordingly.

Project website and virtual consultation room

3.6.3 Consultation materials were made available online in the Documents tab of the project website, and these have been retained online at the time of planning submission. During the first consultation event, SSEN Transmission hosted an online virtual consultation room through the project website, in which viewers who were not able to attend an event in person could review the same information boards that were present at the consultation events. A screenshot of what the virtual consultation room looked like is in Figure 3.1 below. Attendees were able to make comments online via an online form, which was the same as the form at the back of the March 2024 consultation booklet.

Figure 3.1: Virtual consultation room for Hurlie substation proposals

Source: SSEN Transmission

[7] All of these and others can be downloaded as PDFs from: https://www.ssen-transmission.co.uk/2030faqs

4. CONSULTATION FEEDBACK AND OUR RESPONSES

4.1 First Public Consultation Event

4.1.1 The first PAC event was held at Tealing Village Hall on 7 March 2024. Attendees were greeted on the way into the hall by staff at a welcome desk, where there was a voluntary sign-in register. A record was kept of the number of attendees, numbering 135 over the duration of the event. Some photos taken at the first public consultation event are shown in **Appendix J.**

4.1.2 During the 6-week feedback period, which closed on 15 April 2024, 212 responses were received. These responses comprised 116 emails and 96 online responses. Responses were also received from statutory and non-statutory consultees. It is not possible to determine how many email and online responses were made by attendees at the event.

4.1.3 Email and online responses raised multiple themes. Of the 212 responses, 309 references were made to impacts on communities (for example, loss of amenity, socio-economic impact, health, employment, tourism). Impacts on various aspects of environmental impact were referenced on 512 occasions, and the consultation process on 98 occasions. No responses noted agreement, although several attendees at the consultation event did say they supported the transition to net zero, but not the approach to enabling it.

4.1.4 Table 1 below summarises the comments received, grouped into key themes. It also presents a summary of SSEN Transmission's response, and, where applicable, an explanation of how the prospective applicant took account of views raised during the pre-application consultation process. The contents of this table are a close copy of the Feedback table presented in the consultation booklet for the June 2024 events, attached as **Appendix G.**

Table 1: Summary Feedback from First Public Event (March 2024)

Theme	*Response*
Agriculture A number of attendees at the consultation event highlighted the impact on agriculture resulting from the loss of land and the associated impact on food security. It was a common theme among respondents accounting for 16% of all responses.	A key factor in the site selection process was avoiding prime agricultural land. The site avoids that. Notwithstanding this, we accept that the land, which currently supports cereal crops under rotation, is an agricultural asset. As a part of the site selection, brownfield and derelict land was considered within the area of search. None was identified that satisfied other requirements, notably, size, avoiding settlements and other sensitive features
Wildlife Several respondents questioned the impact the proposed development would have on wildlife.	A key driver in the site selection process was to avoid sites which could impact legally protected and locally designated wildlife sites and avoid land with a rich biodiversity. While the site is currently farmland, and natural habitat limited, there are diverse habitats along the Fithie Burn and to some extent along field margins. The Fithie has been modified along stretches adjacent to the site, and the development provides an opportunity to naturalise the Burn, increasing its biodiversity. Further, we have a companywide commitment to deliver a 10% gain in biodiversity across our major

Theme	*Response*
	projects. This will be integrated into the proposed development, specifying a diverse range of new grass, wildflower, shrub and tree planting as part of the landscape design, and wetland habitat as part of the drainage design.
Health and wellbeing The impact of the substation and of the wider overall project on health and mental wellbeing was discussed by several attendees and accounted for over 12% of online and email feedback.	We are mindful of the uncertainty that our proposals can pose to communities who may be affected. Our process for project development seeks to identify options that provide an appropriate balance across a variety of considerations and interests. We aim to do this as swiftly as possible to minimise the duration of uncertainly for affected communities. However, we are also committed to providing sufficient time and opportunity for all stakeholders to feed into each stage of our project development process, so that views can be understood and wherever possible incorporated into design decisions. This is a balance which has to be carefully managed. We understand that everyone may be impacted in different ways and would be interested in residents' views regarding any additional activities that would help to address their specific concerns. Our responses to these topics can be found at: ssen-transmission.co.uk/2030faqs Our statement on Electric Magnetic Fields (EMFs) can also be found here: ssen-transmission.co.uk/emf
Impacts on views Many attendees and respondents are concerned about the impact the proposed substation will have on views from their properties. Concerns about visual impact accounted for 53% of all the issues raised by respondents.	Since our last consultation event, together with our engineering and environmental consultants, we have been examining how we can lower the proposed substation platform (which would house the new electrical infrastructure). As a result of detailed assessments, we now plan to lower the platform from 140.5m Above Ordnance Datum (AOD) to 139.0m AOD. The site falls from around 173m AOD along the northern boundary to 128m AOD along the southern boundary. Visibility from both north and south will be reduced further by landscaping bunds and new planting.
Property values Several attendees expressed concern about the effect of the proposed substation on the values of their homes and their ability to sell, should they wish to.	We understand that there are concerns about the potential impact of our proposed developments on properties within the vicinity of our proposed overhead line alignments and substations sites. These proposals are still under development and are subject to further consultation and design refinement. During this period, we want to work closely with communities and are looking to optimise timescales for decisions on final route alignments and substation location and designs. As the proposed alignments for the overhead lines are determined, and designs of substations are refined, we will engage with property owners, as well as listen to any other concerns there may be. We will look to mitigate impacts on residential properties as far as possible and these impacts will be assessed as part of the Environmental Impact Assessments that will accompany

Theme	*Response*
	our applications for consent. Extensive surveys will be carried out at identified receptors, including selected residential properties so that we are able to model potential impacts on the wider area. Concerns in relation to impacts on property are being noted by our team however, as a regulated business, we are obliged to follow a statutory legal framework under the Electricity Act 1989 and Land Compensation Act 1961. For those entitled to compensation under the legal framework, we will assess any claim on a case-by-case basis under the direction of this legal framework. If this is this case, we recommend that those making a claim engage a professional adviser and we will generally meet reasonably incurred professional fees in these circumstances. However, for the avoidance of doubt, we will not meet fees incurred in objecting to our proposed developments.
Amenity Respondents raised concerns about the impact of the project on amenity.	The selection of the site has sought to minimise impacts on the amenity of those living and working in the area from the outset. In terms of impacts on visual amenity, our response is provided above. Regarding residential amenity and the effects that noise may have on the enjoyment of home and outside space, our response on noise is below. The site avoids direct and indirect effects on footpaths and cycleways.
Noise Many attendees and respondents raised the issue of noise, from both the proposed substation and in combination with the proposed overhead line and other developments such as the battery storage proposals.	There are few properties in the surrounding area having a direct line of sight where noise could be greatest. Further, the formation and planting of landscape bunds will attenuate noise further. We are committed to making sure that noise levels experienced by local residents will be no greater than they are today. Specialist acoustic consultants have been appointed to carry out a Noise and Vibration Impact Assessment which will predict the levels of noise during construction and once the proposed substation is commissioned and under load. Should the assessment suggest that noise will be noticeable at nearly properties, the source of noise will be enclosed and if necessary other measures such as barriers and screens will be incorporated into the design to attenuate noise. The Noise Assessment will include noise from the overhead line, which can be audible in certain weather conditions, and, if the information is available, include noise from the battery storage proposals and other development proposals which may be relevant.
Flooding	We are aware of and have investigated historic flooding in the area, particularly where the Fithie Burn crosses under the U322 Emmock Road. We are aware too of the frequent flooding from the drain

Theme	*Response*
Several attendees at the event highlighted the issue of flooding. Some attendees expressed concerns that the proposed substation would make the situation worse.	which runs parallel, to the road south of Balnuith. As part of the design work, we have commissioned a full Flood Risk Assessment. This has established that the proposed substation will not increase the likelihood of flooding. Indeed, we are exploring how we could reduce flooding by modifying the shallow channel which runs along Emmock Road and by naturalising the Fithie Burn.
Construction traffic Several attendees and respondents raised concerns about the level of construction traffic coming through the village and that contractors involved at Tealing and Seagreen substations had ignored their concerns.	While we are yet to finalise our assessment, we are examining the feasibility of routing construction traffic from the south of the site, coming off the A90 at Claverhouse, following the U322 Emmock Road towards Powrie, crossing the railway and continuing towards the site via Myreton of Claverhouse. We recognise that construction traffic can be a significant concern to other road users and the wider community, in terms of safety, noise and dust. Peak movements will occur when we anticipate the need to import stone during the formation of the platform. This phase is likely to continue for 12 months. A Construction Traffic Management Plan will be one of the many requirements of any planning permission. This will prescribe the routes to be taken by contractors and prohibit the use of some local roads. It will restrict when deliveries can be made, to avoid key times of the day, and ensure that any repairs to roads, culverts, ditches, and verges are made soon after being reported. The Community Liaison Group will be a forum to ensure traffic impacts are minimised.
Site size and creeping industrialisation Many attendees at the event complained of the size of the proposed substation, relative to the village and of the industrialisation of the surrounding area. Some raised the concern that the substation will get bigger in the future.	The requirements for a new substation were set out in the Consultation Document published in May 2023 which explained the factors taken into account when selecting the site, which in brief, included being close to the existing substation, sufficiently large and open, while avoiding prime agricultural land and legally protected sites, existing infrastructure and future development, areas of settlement, water courses and areas vulnerable to flooding. The site meets many of these requirements while providing opportunities to avoid or reduce impacts on the community and environment. The substation platform will be cut into the slope of the fields and landscaping will be provided to screen views of the site. The size of the proposed substation is determined by the extent of the electrical infrastructure required by the new (Kintore to Tealing) and uprated (Alyth and Westfield) 400kV infrastructure and by the assessment of future connection needs and by our licence obligation to provide a secure and reliable network. As License Holder, we have a legal duty to provide a connection requirement to any generation license holder if requested. We cannot predict future connection requirements but continually assess trends in generation and demand to ensure that the grid is capable of responding to new connection demand and supply needs. Currently,

Theme	*Response*
	we are aware of five contracted projects that may connect into substations at Tealing, which are at various stages of development, including the Fithie Energy Park proposals by Banks Renewables Group and Balnuith Battery Energy Storage System (BESS) by developer GPC. Details of these projects, and others, contracted connection dates, consenting status and capacity (Transmission Entry Capacity – TEC) can be found on the TEC Register nationalgrideso.com/data-portal/transmissionentry- capacity-tec-register These proposals will be taken into account in the Environmental Impact Assessment (EIA) which will address the cumulative effects of the proposed substation, the new overhead line, the two battery storage proposals and possibly other projects which come into the planning process as the EIA is being carried out. We understand the concern of the Tealing community regarding further expansion. The proposed substation has been designed to take account of foreseeable future needs. However, the rate at which future connection capacity will be used is unpredictable, as it is driven by market and commercial factors over which we have no control. It will be for the consenting authorities to determine if and when new developments requiring a connection come forward.
Implementing contractor commitments Several attendees raised concerns that the landscaping promised at the existing substation and Seagreen substation has not been properly implemented and has never fully established because of poor maintenance and a failure to control grazing by deer.	We are committed to delivering our and our Contractor's commitments, not only to new planting but other measures which safeguard the community of Tealing. To ensure this is the case at the Emmock site, we will be appointing an independent environmental contractor, reporting to a Liaison Group made up of statutory stakeholders, which will include Tealing Community Council, to ensure all environmental management and mitigation requirements, set out in planning conditions and contracts are implemented and effective. We will also require, as a condition of contract, that the Contractor establishes a Community Liaison Group, to give the Tealing community direct access to the Contractor to address grievances and concerns.
Community and local economy Several respondents raised the potential impact of the proposed development on the community and local economy. Concerns were expressed on the impact to local tourism businesses, and that increasing industrialisation will mean that families will move away from the village, leading to its decline.	For each project we develop, we conduct a Landscape and Visual Impact Assessment, as part of the Environmental Impact Assessment in which we consider visual impact from centres of population, and walking paths and tourist sites, and where possible reduce any potential negative visual impacts, as we have described above. We are in the process of establishing a Community Benefit Fund which will enable us to work directly with local communities to support initiatives across northern and eastern Scotland. We want to give back to the communities hosting our transmission network and to help fund projects that can leave a lasting, positive legacy in those areas.

Theme	*Response*
	In terms of broader community benefits, our Pathway to 2030 projects will boost the economy, support local jobs and businesses. Recent studies show our Pathway to 2030 programme could contribute over £6 billion to the UK's economy, support 20,000 jobs across the UK and benefit Scotland by around £2.5 billion, supporting 9,000 Scottish jobs. We typically hold 'Meet the Buyer' events prior to the construction phase to connect our principal contractors with local businesses and this has proven to be an effective means of sharing the economic benefits of our projects with local communities. We are also actively seeking opportunities to accommodate our workers in a way that provides a range of local benefits. We have prepared an information booklet which describes the benefits we anticipate from our projects and our thinking on how community benefit funding might work. ssen-transmission.co.uk/communitybenefit
Failure to adequately consult Many respondents suggested the consultation process adopted was inadequate, in that insufficient information was provided and insufficient time for communities to respond was provided. Many respondents questioned their ability to influence the project, expressing the opinion that the decision to proceed was already made. Concerns were raised at the absence of consultation by the ESO in defining future energy needs, how they should be met and the rationale for the Kintore to Tealing project and new substation at Emmock in particular.	We are committed to meaningful and constructive engagement with local communities and residents throughout the development process to seek input and feedback into our proposals. As we consult and develop our projects, we aim to be open and transparent with communities, engaging as early as possible to seek input into our early plans. We share our plans in different formats and through different channels and are continuing seeking ways to improve how we share information and seek inputs. We aim to engage as early as possible with the communities where we may have an impact. Our initial engagement in May 2023 aimed to introduce the project and explain the rationale for selecting the site. Our Report on Consultation in December 2023 presented our analysis of the feedback to that consultation and confirmed our plans to take the Emmock site into the planning process. Our formal consultation event in March 2024 presented our proposals at that stage. We have continued to progress our design and resolve areas of community and environmental impact in the process. Our aims at this point are to share our latest designs, show how they have aimed to address feedback and highlight where design work may continue as we prepare for our planning application. We have prepared a separate handout which explains how the need for the project has been determined and the role of the ESO which is available here. ssen-transmission.co.uk/2030-need
Feedback from statutory and non-statutory consultees	Our consultation booklet published in March 2024 to support our formal consultation events, was issued to Angus Council, Historic Environment Scotland (HES), NatureScot, Scottish Environment Protection Agency, (SEPA) Glamis and Area and Tealing Community Councils and various non-statutory consultees.

Theme	*Response*
	HES welcomed the fact that the EIA will include an assessment of the impact of the project on designated heritage assets and the inclusion of a cumulative impact assessment. NatureScot advised that there would be no likely significant effect on the Firth of Tay and Eden Estuary SPA nor the Loch of Kinnordy and Loch of Lintrathen SPAs. Nor on the Outer Firth of Forth and St Andres Bay Complex SPAs. In relation to biodiversity enhancement and NPF4 Policy 3, NatureScot encouraged that biodiversity enhancement should be an integral part of the project from the outset. No responses were received from Angus Council or SEPA, although both have provided feedback at the initial consultation in May 2023 and have continued to through the regular engagement, we hold with all the statutory consultees. The Ministry of Defence pointed to the possibility of low flying aircraft and advised that it will seek a planning condition requiring that details of any tall structures at the site are charted. National Gas Transmission advised of the need to ensure we engage with them as the proposals develop to ensure no conflicts with national infrastructure. That engagement has been ongoing since 2022 and will continue throughout the design and planning processes. Glamis Community Council raised concerns regarding risks to tourism, farming, and health, suggesting impacts could be mitigated by placing the OHL offshore or underground. While the response did not refer to the proposed substation specifically, many of the issues it raised reflect those by the wider community and which have been addressed above.

4.2 Second Public Consultation Event

4.2.1 The second public consultation event took place on the 5 June 2024 at Tealing Village Hall. The purpose of the event was to share project information and provide a summary of the feedback that had been received following the first event in March and respond to the points made. It was also used as an opportunity to share information on key changes made following the first event to substation and landscape design, the construction process, other local projects, and 3D visualisations. All of this information was also summarised in the June 2024 consultation booklet available at the event and on the project website.

4.2.2 Further comments were invited at the second event and instructions were given as to how to provide comments at the event, in the consultation booklet, and on the project webpage.

4.2.3 Attendees were greeted on the way into the hall by staff at a welcome desk, where there was a voluntary sign-in register. A record was kept of the number of attendees, numbering 97 over the duration of the event. Additionally, 32 were in attendance at the event on 6 June 2024. The feedback period closed after a second six-week consultation period on 17 July 2024, and 55 written responses were received. Some photos taken at the second public consultation event are shown in **Appendix K.**

4.2.4 Table 2 below summarises the comments received, grouped into themes.

Table 2: Summary Feedback from Second Public Event

Theme	*Response*
Environmental and Landscape Impact Stakeholders express significant concerns about the environmental and landscape impact of the proposed substation and associated infrastructure projects. These concerns include the destruction of countryside and natural landscapes, negative effects on biodiversity and wildlife, and the potential for environmental contamination from toxic chemicals used in battery storage. The industrialization of rural areas and the visual impact of 'super pylons' and substations are also highlighted, with suggestions for alternative locations to minimize these impacts.	A Landscape and Visual Impact Assessment has been undertaken and is presented as part of the EIA Report. The Assessment provides a detailed assessment of the character of the landscape, with reference to the Site landscape and the two landscape character types (LCTs) of relevance to the assessment, and of the character and sensitivity of views from points around the Site and from local roads, Kirkton of Tealing, Tealing and Inveraldie. A Landscape Design has been prepared, setting out proposals for earth forming to create bunds to screen views into the Site and new woodland, shrub and meadow planting, as landscape mitigation and to further screen views. An Ecological Impact Assessment and Ornithological Impact Assessment have also been undertaken and presented as part of the EIA Report. Both describe the character and sensitivity of habitats across and surrounding the Site and the importance of the Site for protected species such as bat, badger and otter and for different bird species present at the Site including those associated with Special Protection Areas. The Landscape Design provides new habitats which will attract a variety of animals and insects. We are committed to increasing the biodiversity of land hosting new infrastructure and is assessing project opportunities in Angus which will deliver a biodiversity net gain (BNG) of 110% over the level of biodiversity currently. As indicated in Table 1, as a License Holder, we have a legal duty to provide a connection requirement to any generation license holder if requested. We are aware of five contracted projects that may connect into substations at Tealing, which are at various stages of development, including the Fithie Energy Park proposals by OnPath, the Balnuith Battery Energy Storage System (BESS) and the Myerton BESS. A cumulative effects assessment has been undertaken to predict and assess the potential cumulative effects of the Proposed Development next to each of these projects. In addition, the assessment presents the predicted cumulative effects of the Proposed Development in combination with the proposed Kintore to Tealing 400kV OHL, the upgrade of the Alyth to Tealing and Westfield to Tealing OHLs and the tie-ins to Emmock and between Emmock and the existing Tealing substation. The process followed and the rationale for selecting the Site at Balkemback Farm and the has been previously presented. There are no batteries included as part of the proposed electrical transmission infrastructure.

Theme	*Response*
Health and Safety Health and safety concerns are prominent, with stakeholders citing potential health risks from electromagnetic fields (EMFs), noise pollution, and the risk of lithium-ion fires. The welfare of residents, including those with specific health conditions like autism, is mentioned as being at risk due to the project's construction and operation phases. Concerns over water contamination affecting local watercourses and the broader environmental safety issues related to battery storage chemicals are also raised.	The UK has a carefully thought-out set of policies for managing EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These exposure limits have been set by an independent authoritative scientific body who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. Our design must demonstrate how these exposure thresholds and policies have been taken into account and how human health will be safeguarded, both through the planning process and the subsequent certification of the Proposed Development which is required before it can become operational. The EIA Report includes assessments of the possible effects of noise and the risks to water resources. Both assessments detail the measures that will be taken, both as a condition of the Principal Contract and likely planning conditions, to ensure that noise impacts on local residents are avoided and that the likelihood of pollution during construction and operation is kept to an absolute minimum.
Community Impact Feedback indicates a strong concern over the project's impact on the community and individual lifestyles. This includes the disruption of rural life, stress and mental health impacts, and the potential for financial ruin due to property devaluation and the loss of agricultural land. The cumulative impact on Scotland's landscape and the loss of tranquillity in areas like Tealing are also concerns. Stakeholders' express dissatisfaction with the lack of meaningful consultation and communication from SSEN Transmission, feeling their concerns and suggestions for alternatives are not adequately considered.	Our response in relation to community effects and property values is provided in Table 1. We acknowledge that developing major infrastructure, such as the Proposed Development can be disruptive. We are committed to working with the community throughout the construction phase and beyond. We will seek to establish a community liaison group to ensure effective communication with the Principal Contractor and to take all practical steps to minimise disruption. We have ensured regular and meaningful consultation with the community, local residents, local businesses and other local stakeholders throughout the evolution of the Proposed Development and commit to that continuing throughout the planning determination process, and assuming planning permission is granted, throughout construction and operation.
Construction Traffic	Careful consideration has been given to minimising disruption to the community and road users from construction traffic. A circular route is proposed, with construction traffic joining the U322 to access the

Theme	*Response*
Concerns about increased traffic, particularly from heavy goods vehicles (HGVs), and the adequacy of existing infrastructure to handle this increase are frequently mentioned. The suitability of roads like Emmock Road for construction traffic is questioned, with worries about road safety and damage. The impact of traffic on local businesses, tourism, and the overall quality of life in affected communities is also a concern.	Site from the Moatmill Road (along the boundary of the existing Tealing substation) and leaving via the U322 Emmock Road south the join the A90 at Emmock roundabout. It is expected at some improvements to Emmock Road, such as the formation of passing places, and the strengthening of bridges and culverts, may be required. These will be determined through the detailed design stage and would be agreed with Angus Council through a Construction Traffic Management Plan (CTMP). The CTMP would also set out the restrictions that construction traffic will require to meet, and other measures to minimise disruption. Managing construction traffic would be a key focus for the community liaison group. A Socio-Economic Assessment has been prepared to accompany the planning application, which contains a tourism impact assessment. This has determined that the Proposed Development would not impact tourism or tourist businesses.
Agricultural and Food Security Stakeholders are worried about the loss of prime agricultural land and the implications for food security, particularly affecting the Scottish Seed potato industry. The irony of exporting stored electricity to England despite Scotland's sufficient renewable energy sources is noted, alongside concerns about the project's necessity and its alignment with commercial rather than environmental or community interests.	As described in Table 1, avoiding prime agricultural land was a key objective of the site selection process. The Site is not Prime Agricultural Land although we acknowledge its agricultural use. The site is predominantly arable. It does not support potato production. While the planning application boundary extends to some 77.9 ha, land to the north and north east will be returned to agriculture at the end of the construction phase.
Alternative Sites There is a strong call for the consideration of alternative solutions and locations for the proposed projects. Suggestions include using disused areas like airfields, installing solar panels on rooftops, particularly on council housing, and considering offshore cables. Stakeholders criticize the project for not fully exploring these alternatives and question the project's claimed benefits, suggesting it serves commercial	The need for the Proposed Development, which has been explained in various consultation materials, is to facilitate the transfer of the many GW of power being generated in the north east of Scotland and off the north east coast as part of the wider investment in UK transmission infrastructure, on and offshore, necessary to deliver on the UK's commitment towards net zero. This need defines the physical size of the new substation required. The choice of the Site at Balkemback Farm is the culmination of an extensive site selection exercise, set out in a Consultation Document published in May 2023, which has involved the identification of candidate sites in the vicinity of Tealing, and their appraisal, based on desk and site based expert assessment of technical and environmental factors. Many alternatives have been considered as part of the process, including disused areas. Specifically, the suitability of the former RAF Tealing site was considered but

Theme	*Response*
interests rather than local needs or environmental goals.	dismissed because the Site is vulnerable to flooding and because it would involve extensive work to divert existing OHL lines which currently connect into the existing Tealing substation. Considering alternative sites and setting out the rationale for the selection of the proposed site is part of the formal EIA process. The site selection process will therefore be the subject of further scrutiny during the planning determination process.
Consultation Process Feedback reflects dissatisfaction with the consultation process, describing it as inadequate, lacking in transparency, and failing to address community concerns. Stakeholders criticize SSEN for not providing clear, consistent information and for not genuinely considering feedback from previous consultations. The need for a more meaningful engagement with the community and a re-evaluation of the project considering its widespread opposition is emphasized.	As we explain in Table 1, we are committed to meaningful and constructive engagement with local communities and residents to seek input which helps inform the development of our projects. Throughout the evolution of this project, we have sought to provide clear information, consistently and to demonstrate how we have taken feedback into account. The nature of developing major infrastructure is to balance different, often competing interests. Sometimes, this can appear that feedback has been ignored. This is never the case, but a balance of environmental, community, technical and cost considerations must be found. We remain committed to meaningful and constructive dialogue as the project progresses and will continue to seek community input at all stages during and after the determination of the planning application.

4.3 Overview of key design changes in response to feedback

4.3.1 An overview of key design changes made in response to feedback between the PAC 1 and PAC 2 event is presented here and was shared in the consultation booklet produced for the PAC 2 event.

Substation Design

Since our last consultation, we have refined our substation design by reducing the platform width slightly from 300m to 285m and by lowering the platform from 140.5m to 139m. Combined with the landscaping bund and design along the north of the substation platform, this reduces the visibility of the substation equipment from the north.

This also reduces the height of the fill along the southern edge of the platform. The new terminal connection towers connecting with new (from Kintore) and uprated (from Alyth and Westfield) 400kV overhead lines will be the main visible elements.

We have redesigned the access to the site, moving it further away from Balnuith, reducing direct views of the site. We have repositioned the landscape bund closer to the eastern boundary and sited the compound and laydown area immediately behind the bund, screening views from Balnuith.

This and the bund running the full length of the eastern boundary will be formed and planted early in the construction programme to maximise its benefit in screening the construction works. We intend to reshape the channel which currently drains the hills above the site into the Fithie Burn to slow storm flows and reduce risks from flooding the Emmock Road.

To meet safe operations requirements and minimise overall access requirements, the terminal connection towers and the connection points within the substation have been increased from 25m to 75m which has required that the platform has been extended.

Rather than increase the whole platform, the platform has been extended locally, in a trapezoidal shape by approximately extensions which are approximately 45m have been limited to around the tower bases. Having the towers located at the same level as the platform reduces the overall height of them.

Landscape Design

Since our last consultation, we have refined our substation design by lowering the platform from 140.5m to 139m.

With the exception of repositioning the bund adjacent to the new access, there have been no major changes to the landscape design. Since our last consultation, the design has been further developed. The landscaping proposals will introduce a variety of habitat types that will provide both visual screening and improved opportunities for biodiversity. Broadleaved woodland, with species such as rowan, willow, hazel and birch will be complemented by grass meadows and wildflowers. Hedgerows of holly, dog rose and alder will be provided to allow connection for species through the creation of 'wildlife corridors'. Collectively the planting proposed will be designed to ensure that habitats are created for invertebrates, mammals and avian species.

As indicated above, SSEN Transmission has a policy commitment to deliver 10% more biodiversity compared to the baseline condition.

At Emmock, while the site is predominantly arable land, there are diverse habitats along the field margins and Fithie Burn.

Our landscaping proposals indicated above have been developed with our BNG requirements in mind and this would be reflected in the habitat creation and species selections we make as part of that design.

There have been no amendments to the drainage design, with the exception of minor repositioning of the SuDS ponds to accommodate the repositioned 275kV overhead connection to the existing substation.

5. CONCLUSIONS

5.1.1 This PAC Report documents the pre-application consultation process undertaken in respect of SSEN Transmission's proposals for the Emmock 400kV substation proposals, which are now the subject of a planning application to Angus Council. In preparing this PAC Report we have made reference to the requirements of Regulation 7B of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) and *Planning circular 3/2022: development management procedures*.

5.1.2 A Proposal of Application Notice with attachments was submitted to Angus Council on 31 January 2024 and sent to local community councils and consultees. Public notices and publicity by other means was carried out to advise members of the public on the dates and locations of the events, where to find more information and how to respond.

5.1.3 Information in respect of both events was compiled by the project team and made available at the events themselves and online, including two consultation booklets (March and June 2024), information boards, large format plans, 3D visualisations, and information leaflets on various topics. In respect of the first event, a virtual consultation room was made available via the project webpage featuring the same information boards as the in-person public event.

5.1.4 The first public consultation event was held at Tealing Village Hall, on 7 March 2024, and a final consultation event at Tealing Village Hall on 5 June 2024. Consultation periods in which the public and consultees could make comments were open for six weeks following each round of consultation.

5.1.5 The consultation was designed to facilitate engagement with the local community, community councils, statutory authorities and local leadership, and to invite feedback on the Proposed Development. Public and consultee feedback on the proposals, as well as the SSEN Transmission response to this feedback, made following the first public event were summarised and presented on information boards at the second public event and in the June 2024 consultation booklet.

5.1.6 The approach to public consultation has ensured that stakeholders and consultees have been given the opportunity to comment on the proposals and understand how feedback has been taken on. This has enabled locally important issues and concerns to be identified and subsequently considered in the preparation of the Emmock 400kV substation planning application.